

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States,
et al.,

Defendant.

NO. 2:25-cv-00244-LK

SUPPLEMENTAL
DECLARATION OF JEFFREY G.
OJEMANN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION

NOTE ON MOTION CALENDAR:
February 28, 2025 at 2:00 p.m.

1 I, Jeffrey G. Ojemann, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and attest to
3 the information set forth below through my personal knowledge as well as through Seattle
4 Children's Hospital ("Seattle Children's") personnel who have assisted me in gathering this
5 information from our institution.

6 2. This declaration supplements my declaration dated February 5, 2025, which I
7 incorporate here by reference.

8 3. The Court's February 14, 2025 Order granting plaintiffs' motion for a temporary
9 restraining order (the "TRO") has provided immediate positive, albeit temporary, relief to Seattle
10 Children's with regard to the emergency situation Seattle Children's was facing as a result of the
11 Executive Order "Protecting Children From Chemical and Surgical Mutilation" that was issued
12 on January 28, 2025 (the "Executive Order"). For the time being, Seattle Children's can focus
13 on providing medically indicated care to its patients without the specter of cataclysmic cuts to
14 our federal grant funding for pediatric research activities as a result of the Executive Order.

15 4. The TRO has provided immediate positive relief to Seattle Children's workforce
16 members who, for now, do not need to fear criminal enforcement action under Section 8.a of the
17 Executive Order, and can instead focus on providing high quality medically indicated care to our
18 patients.

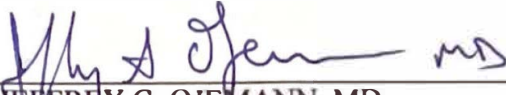
19 5. The TRO has reduced the number of panicked calls, emails and visits from our
20 patients and families who have been scared and anxious about losing their access to gender-
21 affirming health care. However, some parents have expressed significant concerns about the
22 temporary nature of the TRO.

23 6. The TRO has allowed Seattle Children's to deliver on our mission while ensuring
24 compliance with all applicable laws. Seattle Children's remains concerned, however, that if a
25 preliminary injunction is not granted the Executive Order will once again create severe and
26 mounting pressure from the federal government to either stop providing gender-affirming care

1 or risk federal grant funding that allows Seattle Children's to be a leader in life-changing research
2 aimed at a broad range of disabling and deadly childhood illness and disease. If a preliminary
3 injunction is not entered, Seattle Children's and its providers will also return to a fear of federal
4 prosecution for providing gender-affirming care, which would impede our ability to provide
5 comprehensive and medically indicated care to our patients.

6 I declare under penalty of perjury under the laws of the State of Washington and the
7 United States of America that the foregoing is true and correct.

8 DATED this 18th day of February 2025 at Seattle, Washington.

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11 JEFFREY G. OJEMANN, MD
12 SVP and Chief Physician Executive
13 Seattle Children's Hospital
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